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JEFFERSON PILOT

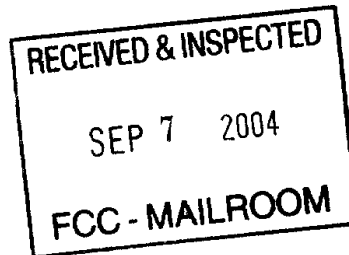
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September 2, 2004

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C.



Via Federal Express

Re: Notice of Proposed Rulemaking in EB Docket Number 04-296

Dear Ms. Dortch:

Jefferson-Pilot Communications Company ("Jefferson-Pilot") submits these comments in response to the Federal Communications Commission's Notice of Proposed Rulemaking in EB Docket Number 04-296. In its Notice the Commission proposed to consider improvements to or substitutions for its Emergency Broadcast System ("EAS").

Jefferson-Pilot Communications Company, through nine subsidiaries, owns and operates a sports broadcast production company, 18 radio stations and 3 TV stations in San Diego, Denver, Miami, Atlanta, Charleston, Charlotte and Richmond. Though mid-size, Jefferson-Pilot has the benefit of observing and experiencing the broadcast industry across most of the country and in a wide range of markets. What we see on a day-to-day basis is that the vast majority of broadcasters are willing and able to serve and do serve the public by providing needed safety information in a fast, efficient and effective manner. Broadcasters do so now without detailed mandatory government requirements.

For this and other reasons the FCC's review of the Emergency Alert System is a welcome development. Significant ownership and operating changes have reshaped over the air broadcast radio. Simultaneously, over the air television broadcasters have grown their local news programming explosively. The migration of TV to a DTV landscape will increase the opportunities for and effectiveness of local news offerings, which routinely include information valuable to public safety. Stations are quick to freely provide urgent safety information between news programs. In fact, finding strong examples of broadcasters serving the public with urgent information only takes looking back a few days. With hurricane Charley, local TV broadcasters were the first--prior to the EAS or NOAA--to alert the public that Charley would take a more southern route than the initial predicted route through Tampa. Lives likely were saved as a result.

In addition to radio, television now has emerged as an ideal distribution mechanism in times of emergency. Once the DTV shift has occurred this spectrum will allow for further enrichment of the industry's ability to serve the public in times of crisis.

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To improve the EAS, the Commission should provide for direct distribution of alerts to TV and radio stations. Each station will not be dependent on whether or not alerts are passed down a chain from those higher up on the chain. Further, discretion whether to broadcast each alert should be left to the individual station. The local stations are in the best position to know what the public already knows about an event based upon what the station and other local stations have broadcast prior to receipt of an alert from the emergency system. Those stations can make the best judgment whether broadcasting the alert would help the viewers and listeners.

We respectfully believe that, when current broadcast conditions are considered, an alert system based on direct distribution coupled with the exercise of local station discretion would best serve the interests of local communities. Thank you for the opportunity to comment on this matter. We trust that these views will be helpful.

Sincerely,



Leon E. Porter

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